

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

IN RE: RONDA F. LEWIS

**CASE NO. 13-24175-D
CHAPTER 13**

Debtor(s)

RONDA F. LEWIS

Plaintiff(s)

vs.

Adv. Proc. No.

MEMPHIS VAMC

Defendant(s)

COMPLAINT FOR TURNOVER OF PROPERTY/FUNDS TO THE ESTATE

The Debtor, as Plaintiff, brings this complaint for turnover of property/funds to the estate pursuant to FED. R. BANKR. P. 7001(1) and 11 U.S.C. § 542(a) to recover funds in the amount of \$1,183.00 as to the offset of Debtor's 2013 tax return.

The Court has jurisdiction of this case under the provisions of 28 U.S.C. §§ 1334(b) and 157(a). By virtue of 28 U.S.C. § 157(b)(2)(E), this is a core proceeding.

Under the particular facts and circumstances, and applicable law, the Plaintiff is entitled to possession of the above-described property/funds of the estate for "use" as contemplated in 11 U.S.C. § 363.

WHEREFORE, the Plaintiff respectfully requests that an expedited hearing be set to consider the requested relief, and that the court enter its order directing the Defendant to refund the above said funds to Debtor.

Attorney for the Plaintiff(s)

/s/ Sidney A. Feuerstein

Sidney A. Feuerstein (7676)

100 N. Main Street, Suite 1935

Memphis, Tennessee 38103

(901) 527-8571 Telephone

(901) 523-2477 Facsimile

sfeuerstein@feuersteinlaw.com

CERTIFICATE OF SERVICE

The undersigned party, attorney for a party, or agent hereby certifies that the above Complaint will be promptly served, postage prepaid, or hand-delivered to all interested parties listed herein below. **Date of Service March 5, 2014.**

/s/ Sidney A. Feuerstein
Attorney for Debtor(s)

cc:

Debtor (USPS)
Trustee (email)
Memphis VAMC (USPS)
3410 Lebanon Pike
Murfreesboro, TN 37129